

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

WILLIAM REAGAN WYNN

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No. 3:22-mc-00027-B

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE AND FOR LEAVE TO FILE UNDER SEAL**

TO THE HONORABLE JANE J. BOYLE, UNITED STATES DISTRICT JUDGE:

William Reagan Wynn, by and through undersigned counsel, respectfully requests that the Court allow a 14-day extension of time to respond to the Court's Notice and Order entered on April 21, 2022. Additionally, counsel requests leave to file the response under seal. As grounds therefor, counsel states as follows:

Mr. Wynn has sought and received an extension of time for the reporting requirements set forth in the Default Judgment attached to this Court's Notice and Order. The reporting is now due to the State Bar of Texas on or before May 13, 2022. An extension of time in the instant matter (to May 19, 2022) will allow Mr. Wynn to confirm to the Court that those State Bar requirements have been completed.

Counsel believes that information likely to be contained in Mr. Wynn's response to the Court's Notice and Order is appropriate for filing under seal and as such, respectfully requests that: 1) the Court permit the response to be filed on or before May 19, 2022; and 2) the Court allow the response to be filed under seal.

Respectfully submitted,

/s/ Camille M. Knight

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2022, I filed this Motion for Extension of Time to File Response and for Leave to File Under Seal via the Court's CM/ECF system, thereby providing service on attorneys of record.

/s/ Camille M. Knight

Camille M. Knight